

Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

TANA IHRIG and MARK IHRIG,	)	NO. 2:06-cv-00512-RSM
	)	
Plaintiffs,	)	DEFENDANT LVNV FUNDING,
	)	LLC's RULE 26(a)(1) DISCLOSURES
v.	)	
	)	
WASHINGTON MUTUAL BANK, <i>et al.</i> ,	)	
	)	
Defendants.	)	

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, Defendant LVNV Funding, LLC ("LVNV") provides the following information:

**A. IDENTITY OF INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION RELEVANT TO DISPUTED FACTS.**

Defendant LVNV identifies the following individual(s), other than Plaintiffs and the other named Defendants, who may have relevant information: John Shinovich, Authorized Representative, LVNV.

Identification of any person does not constitute a representation that such person has information that is nonprivileged, nor does it constitute a waiver of any privilege or objection that may be made to such witness's testimony.

DEFENDANT LVNV  
FUNDING, LLC's RULE  
26(a)(1) DISCLOSURES  
0605-03 ss

STEPHEN A. BERNHEIM  
ATTORNEY AT LAW  
512 Bell Street  
Edmonds, Washington 98020  
(425) 712-8318  
Fax (425) 712-8418  
e-mail:steve@stevebernheim.com

Defendant LVNV may identify additional witnesses through discovery and continued investigation. Defendant LVNV specifically reserves the right to offer witnesses at trial that are not identified above.

**B. DESCRIPTION (BY CATEGORY) OF ALL DOCUMENTS, DATA COMPILATIONS AND TANGIBLE THINGS THAT MAY BE RELEVANT TO DISPUTED FACTS.**

Defendant LVNV identifies the following categories of documents, data compilations and tangible things that may be relevant to disputed facts: (i) notes of Defendant Resurgent Capital Services, LP, received after Plaintiffs filed this action; (ii) notes of the agencies with whom Plaintiffs' account was placed, received after Plaintiffs filed this action.

Defendant LVNV anticipates that Plaintiffs and the other named Defendants may also have documents, records, data and things that may be relevant to disputed facts.

Defendant LVNV may identify additional categories of documents, data compilations, and other tangible things through discovery and continued investigation. Defendant LVNV specifically reserves the right to offer exhibits at trial that do not fall within the above-listed category.

**C. COMPUTATION OF DAMAGES CLAIMED BY DEFENDANT.**

Not applicable.

**D. INSURANCE AGREEMENTS WHICH MAY BE LIABLE TO SATISFY PART OR ALL OF A JUDGMENT.**

Defendant LVNV has not tendered the defense of this claim to its insurance provider.

DATED this 26th day of July, 2006

/s/ Stephen A. Bernheim  
 Stephen A. Bernheim, WSBA #15225  
 Attorney for Defendants LVNV Funding, LLC,  
 Resurgent Capital Services, LP and Sherman  
 Financial Group LLC

DEFENDANT LVNV  
 FUNDING, LLC's RULE  
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